

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: December 13, 2004

Site Contact(s): Dyan Foss
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Regulatory Contact: Edd Kray
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Agency: CDPHE

Purpose of Contact: Disposition of Second Floor Survey Unit 27

Discussion

In accordance with the 776/777 DOP, Appendix I, the preparation of the facility for demolition is conducted in consultation with the CDPHE and is based on a series of decisions primarily related to maintaining releases to the environment and dose and risk to the workers as low as reasonably achievable (ALARA). This contact record documents the activities that were conducted to prepare the Second floor Survey unit 27 for demolition. Survey Unit 27 consists of Rooms 237, 237B, 237C, 237D, and 238.

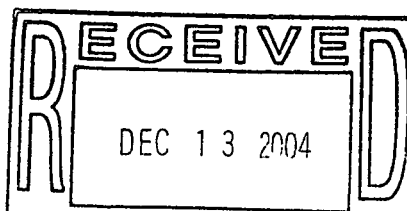
The preparation process for Survey unit 27 was initiated June 28, 2004 when a package for in-process radiological surveys was prepared and executed. Once the surveys were complete, the following actions were taken as part of the ALARA-based decontamination effort:

- Concrete shaving was performed on floor surfaces.
- Expansion joints, cracks, and bolts in the floor were remediated, as necessary.

The area was resurveyed in accordance with the Radiological Pre-Demolition Survey Plan for Buildings 776/777. The surveys were provided to the CDPHE project representative, and a walk down of the area was conducted.

In addition to the radiological hazards, the non-radiological hazards have also been addressed in Survey unit 27. The following summarizes the non-radiological activities:

- Room 237 on the second floor of Building 776 contained a permitted RCRA container storage area, Unit 776.1. This area was washed and rinsed for RCRA closure. Closure of this area was approved by Harlen Ainscough and documented in a Contact Record dated November 15, 2004.
- Chemicals and hazardous substances have been removed.
- Beryllium regulated and controlled areas have been closed. None of the rooms in Survey Unit 27 were listed on the historical list of rooms with potential beryllium contamination. The baseline beryllium characterization of these rooms conducted



by KH in 1999 found no removable beryllium contamination. Prior to final encapsulation the room was again surveyed. Twenty (20) samples were collected in the survey unit on horizontal surfaces from floor to ceiling. All samples were below the analytical reporting limit of 0.1 ug/100 cm².

- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.

Based on the survey results and the principles of ALARA, the risks (industrial and radiological) to the workers are greater than the benefit in source term reduction that would be gained through additional decontamination. The state project representative agrees that decontamination inside Survey unit 27 has progressed to the point of reasonably achievable removal and that the subsequent step of encapsulation is appropriate.

In summary, ALARA-based decontamination has been completed, Survey unit 27 will be encapsulated and surveyed for removable contamination, and controls will be applied during demolition. This contact record will be included as an appendix to the characterization report for Survey unit 27 and placed in the demolition file to ensure the controls and requirements are included in the demolition work packages for these survey units.

Contact Record Prepared By: Dyan Foss

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